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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN JOSE DIVISION

JULIE SCOTT,

Plaintiff,

vs.

UNUM LIFE INSURANCE COMPANY OF  
 AMERICA and CISCO SYSTEMS, INC.  
 LONG-TERM DISABILITY PLAN,

Defendants

Case No. 05-00275 JF (PVT)

**STIPULATION AND [PROPOSED]  
 ORDER FOR EXTENSION OF TIME  
 TO FILE MOTION FOR ATTORNEYS'  
 FEES AND COSTS**

WHEREAS, on December 7, 2006, the Court entered Judgment in this action, and

WHEREAS, the parties intend to file motions for attorneys' fees and costs of litigation  
 pursuant to ERISA § 502(g), 29 U.S.C. § 1132(g), and

WHEREAS, pursuant to Civil Local Rule 54-6(a), the parties' motions are due to be filed

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 [CASE No.05-00275 JF (PVT)]

no later than December 21, 2006, and

WHEREAS, pursuant to Civil Local Rule 54-6(a), the parties are in the process of meeting and conferring for the purpose of resolving all disputed issues relating to attorneys' fees;

WHEREAS, the only other time modifications in the case were (1) a September 20, 2005 Stipulation and Order Continuing Case Management Conference; (2) a November 29, 2005, Stipulation and Order Continuing Case Management Conference; and (3) a February 28, 2006 Stipulation Continuing Hearings and Case Management Conference.

NOW, THEREFORE, it is hereby stipulated by and between the parties, through their respective counsel, that the time for filing a motion for attorneys' fees and costs shall be extended to January 26, 2006. The parties' opposition briefs shall be due by February 9, 2007. The parties' reply briefs shall be due by February 16, 2007. The parties' motions shall be heard by this Court on March 2, 2007, or as soon thereafter as possible.

Dated: December 14, 2006

Respectfully submitted,

By: /s/ Claire Kennedy-Wilkins  
Claire Kennedy-Wilkins

LEWIS, FEINBERG,  
RENAKER & JACKSON, P.C.

Attorneys for Plaintiff

Dated: December 14, 2006

/s/ Horace W. Green  
Horace W. Green  
Joanne M. Ryan

GREEN & HUMBERT  
Attorneys for Defendants

I hereby attest that I have on file all holograph signatures for any signatures indicated by a "conformed" signature (/S/) within this e-filed document.

Dated: December 14, 2006

/s/ Claire Kennedy-Wilkins  
Claire Kennedy-Wilkins

STIP. & PROPOSED ORDER FOR EXTENSION OF TIME TO FILE MTN. FOR ATTORNEYS' FEES  
[CASE No.05-00275 JF (PVT)]

[~~PROPOSED~~] ORDER

Having reviewed the parties' stipulation, and good cause appearing, the time for filing motions for attorneys' fees and costs is hereby extended to January 26, 2007. The parties' opposition briefs shall be due by February 9, 2007. The parties' reply briefs shall be due by February 16, 2007. The parties' motions shall be heard by this Court on March 2, 2007.

IT IS SO ORDERED.

Dated: 12/18/06

  
JEREMY FOGEL  
U.S. District Court Judge